

ENTERED

April 16, 2022

Nathan Ochsner, Clerk

**STATEMENT IN
SUPPORT OF PROBABLE CAUSE**

IN RE: Christian MARTINEZ

I, Ramon Deliz, declare and state as follows:

1. On April 14, 2022, Homeland Security Investigations (HSI), Laredo, TX Office Special Agent Ramon Deliz interviewed Border Patrol Agent (BPA) Luis Davila Jr at the United States Border Patrol (USBP) Checkpoint located on Highway 59, sixteen miles west of Freer, Texas in Webb County. BPA Davila Jr stated that he had been a Border Patrol Agent since 2003 and that throughout his career he had been involved in the investigation of hundreds of human smuggling events at or away from the checkpoint. BPA Davila Jr said that at approximately 4:00 a.m., a white in color box truck showed up at the checkpoint. The truck was being driven by a young adult male, later identified as Christian MARTINEZ. As the truck arrived at the primary lane of the checkpoint, BPA Davila Jr identified himself as a BPA and performed an immigration inspection on MARTINEZ, who stated that he was a United States citizen. MARTINEZ also stated that he was on his way to deliver a load and presented a copy of a handwritten bill of lading. During their exchange, BPA Davila Jr noted that MARTINEZ avoided conversation with him and when he presented the previously mentioned bill of lading, his hand was shaking. When asked what he was hauling, MARTINEZ said that he did not know, just parts. MARTINEZ then presented a UPS handwritten manifest not common with commercial drivers. BPA Davila Jr did not recognize MARTINEZ as one of the regular UPS drivers that go through the checkpoint daily.
2. BPA Davila Jr continued narrating while he was conversing with MARTINEZ, BPA Andrew Nelson arrived with his service canine Egon (#220008) which alerted to the possible presence of drugs or people in the cargo area of the truck. BPA Davila Jr asked MARTINEZ if the cargo area was locked, and MARTINEZ stated it was locked with a padlock. BPA Davila then asked for consent to search the cargo area and MARTINEZ turned off the truck and gave him the keys. BPA Nelson, BPA Villafranca and BPA Davila Jr opened the rear door and an inspection of the cargo area revealed numerous persons hidden inside cardboard boxes. A total of twenty-seven 27 individuals were discovered inside the cargo area of the truck. An immigration inspection revealed that all 27 individuals were foreign individuals illegally present in the United States. At that time, all

I find probable cause that the defendant(s) committed an offense against the laws of the United States and may be therefore further detained pending presentment before a judicial officer.

NEZ were apprehended.

oximately 6:30 a.m., HSI Laredo Special Agents (SA) Corey Rios and Deliz identified and interviewed two (2) individuals, Laredo BONILLA-Raygoza and Juana Cristina GONZALEZ-

April 15, 2022, 03:46 PM, at Laredo, Texas.

Diana Song Quiroga
DIANA SONG QUIROGA
UNITED STATES MAGISTRATE JUDGE

As Gabriel Rios and Deliz identified and interviewed two (2) individuals, Laredo BONILLA-Raygoza and Juana Cristina GONZALEZ-

Cervantez. Material Witness BONILLA-Raygoza stated that he was a citizen of Mexico. Material Witness GONZALEZ-Cervantez stated that she was a citizen of Guatemala. Both stated that they were illegally present in the United States. Both material witnesses indicated they illegally entered the United States in April of 2022, at or near Laredo, TX, by way of wading the Rio Grande River from Mexico. Both material witnesses stated arrangements were made with members of a human smuggling organization(s) (HSO) for them to be transported to various cities within the interior of the United States. All material witnesses reported smuggling fees were paid for them to be smuggled into the United States. All material witnesses stated they were brought in vehicles to an unknown location where they observed a box truck with open doors. Both material witnesses stated they were loaded directly from the load vehicles into the cargo area of the truck in which they were later apprehended. Both material witnesses indicated they did not observe the driver of the truck. Both material witnesses explained the truck doors were closed after they were loaded inside the truck and it did not stop until they were detained at the USBP checkpoint.

I declare (certify, verify, or state) under penalty of perjury that the forgoing is true and correct. Executed on the 14th day of April, 2022.



Ramon Deliz
Special Agent
Homeland Security Investigations

Having reviewed the foregoing declaration, I find probable cause that the defendant(s) named above committed an offense against the laws of the United States and may therefore be further detained pending presentment before a judicial officer.

Executed on the _____ day of _____, 20_____.

UNITED STATES MAGISTRATE JUDGE